



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

**1445 Ross Avenue, Suite 1200
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December 7, 2015

William Childress
Bureau of Land Management
Las Cruces District Office
1800 Marquess Street
Las Cruces, New Mexico 88005

RE: NMNM 1241042800 (L0310) 1610

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Bureau of Land Management (BLM) and Western Area Power Administration (Western) Final Environmental Impact Statement (FEIS) for the Southline Transmission Line Project. The purpose of the FEIS is to analyze the potential impacts of the BLM's granting a right-of-way (ROW) to Southline Transmission, LLC (Southline), for the purpose of constructing and operating a 345-kilovolt (kV) overhead transmission line from the Afton Substation in New Mexico to the Apache Substation in Arizona.

EPA's review of the Draft Environmental Impact Statement (DEIS) identified a number of potential adverse impacts. For these reasons we rated the DEIS as "Environmental Concerns – Insufficient Information" (EC-2). In regards to the FEIS, EPA continues to have concerns for greenhouse gases and climate change. We have enclosed detailed comments which clarify our concerns.

EPA appreciates the opportunity to review the FEIS. Please send our office one copy of the record of decision (ROD) to my attention. If you have any questions or concerns, I can be reached at hayden.keith@epa.gov or 214-665-2133.

Sincerely,

A handwritten signature in dark ink, appearing to read "Keith Hayden", is written over a faint, stylized background graphic that resembles a signature or a set of initials.

Keith Hayden
Chief, Special Projects Section

Enclosure

**DETAILED COMMENTS ON THE
BUREAU OF LAND MANAGEMENT AND
WESTERN AREA POWER ADMINISTRATION
FINAL ENVIRONMENTAL IMPACT STATEMENT
FOR THE SOUTHLINE TRANSMISSION LINE PROJECT**

BACKGROUND: The proposed FEIS and Resource Management Plan Amendment (RMP) would include the construction of approximately 240 miles of new double-circuit 345-kV transmission line, and the upgrade of approximately 120 miles of Western's existing Saguaro–Tucson and Tucson–Apache 115-kV transmission lines to a double-circuit 230-kV transmission line. The project would also involve the interconnection and upgrade of 14 existing substations along the project route in New Mexico and Arizona, and the potential construction of a new 345-kV substation facility proposed for Luna County, New Mexico. This FEIS includes an analysis of an RMP amendment due to portions of alternative route segments crossing visual resource management (VRM) class II areas, and avoidance areas designated for the Butterfield Trail near Lordsburg Playa.

Southline submitted an application to the BLM to use BLM-administered public lands for a portion of the proposed project. Southline requested consideration of its project for Western funding under the amended Hoover Power Plant Act of 1984. BLM must consider Southline's request to be granted a ROW on BLM-administered public lands for the construction, operation, maintenance, and decommissioning of the proposed transmission line. Western must consider the upgrading of two of its existing transmission lines, use of existing transportation easements, and funding under the Hoover Act.

GREENHOUSE GAS AND CLIMATE CHANGE ANALYSIS

On December 18, 2014, the Council on Environmental Quality released revised draft guidance for public comments that describes how Federal departments and agencies should consider the effects of greenhouse gas emissions and climate change in their National Environmental Policy Act reviews. We recommend that BLM use the Council on Environmental Quality's revised draft guidance to help outline the framework for future analysis of these issues. We appreciate that estimated GHG emissions have been calculated for each of the alternatives analyzed in the FEIS. However, the discussion regarding the potential climate change impacts associated with the proposed projects' anticipated GHG emissions is limited to a determination that "emissions from the proposed project would be a tiny fraction of the existing annual Federal and State emissions" and "it is impossible to determine accurately the specific impacts on the environment that would be caused by a new source of GHGs". Instead, we recommend that future analyses use the estimated GHG emissions as a reasonable proxy for climate change impacts when comparing the proposal and alternatives.

Additionally, the cumulative effects discussion in Chapter 4 states that the "cumulative effect of climate change in the air quality CEAA would be major and long-term; however, the contribution of the proposed project and alternatives to this change would be negligible". The

revised draft CEQ guidance on climate change urges against such conclusions, stating that, “This approach does not reveal anything beyond the nature of the climate change challenge itself: the fact that diverse individual sources of emissions make relatively small additions to the global atmospheric GHG concentrations that collectively have huge impact.” We recommend that future analysis avoid the use of language that discounts the individually minor, but collectively significant, contributions that projects such as the Southline Transmission Line have upon global climate.